



December 17, 2012

Jeanine Townsend, Clerk to the Board  
State Water Resources Control Board  
P.O. Box 100  
Sacramento, CA 95812-0100

**Subject: Comment Letter – Revised Draft Phase II Small MS4 Permit**

**MEMBER AGENCIES**

- City of Cloverdale
- City of Cotati
- City of Healdsburg
- City of Rohnert Park
- City of Santa Rosa
- City of Ukiah
- County of Sonoma
- Sonoma County Water Agency
- Town of Windsor

**VIRGINIA PORTER**  
Executive Director

300 Seminary Avenue  
Ukiah, CA 95482  
(707) 833-2553

Dear Ms. Townsend and Members of the State Water Board:

Thank you for the opportunity to respond to the third draft of the Phase II Small MS4 General Permit. This letter is the formal comment from the Russian River Watershed Association (RRWA) to the State Water Resources Control Board on the third draft of the NPDES General Permit and Waste Discharge Requirements for Storm Water Discharges from Small Municipal Separate Storm Sewer Systems (Draft Permit).

RRWA provided comment on the first and second drafts of this permit. We appreciate the changes that have been made in this third draft. Our comments that follow are brief and are limited to the changes that have been made in red-line in the third draft.

**Recommendation 1.** Revise Receiving Water Limitations language prior to permit adoption rather than include a reopener to address the topic at some unknown time in the future. The California Stormwater Quality Association (CASQA) is in a position to work with SWRCB staff to develop permit language to bring this about.

**Recommendation 2.** Remove Attachment J and allow Central Coast MS4s to comply with the general order post-construction standards.

**Recommendation 3.** Revise the Draft Permit to include findings regarding the maximum extent practicable (MEP) standard similar or identical those in the existing Phase II permit.

**Recommendation 4.** Revise the educational requirements to match those previously included in the second draft of the permit.

**Recommendation 5.** In the IDDE Section, revise the language to clarify that site visits are limited to assessment of outfalls and to indicate that Permittees have the option of creating a self-certification program in lieu of site visits.

RRWA also reiterates our request that the State Board work with the California Legislature to prompt legislative action to create mechanism to raise revenues to fund storm water programs. For most storm water programs in California, due to the

constraints of Proposition 218 (constitutional initiative -1996), the city, county or district's General Fund is the only funding source for ongoing stormwater program requirements. The need to have dedicated storm water funds is tremendous.

Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in black ink, appearing to read "Virginia Porter". The signature is written in a cursive, flowing style.

Virginia Porter  
Executive Director, RRWA

C: RRWA Board of Directors  
Matthew St. John, RWQCB – Region 1 Executive Officer  
Rebecca Winer-Skonovd, CASQA Phase II Committee Chair